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Attorneys for Defendants, Fidelity National
Title Insurance Co. of New York and Nations
Title Insurance of New York, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

WALSH SECURITIES, INC.,	:	
	:	
Plaintiff,	:	Judge Dickinson R. Debevoise
	:	Magistrate Judge Michael A. Shipp
v.	:	
	:	
CRISTO PROPERTY MANAGEMENT, LTD., a/k/a	:	No. 97-3496 (DRD)(MAS)
G.J.L. LIMITED; DEK HOMES OF NEW JERSEY, INC.;	:	
OAKWOOD PROPERTIES, INC.; NATIONAL HOME	:	Motion Return Date:
FUNDING, INC.; CAPITAL ASSETS PROPERTY	:	
MANAGEMENT & INVESTMENT CO., INC.; CAPITAL:	:	
ASSETS PROPERTY MANAGEMENT, LLC; WILLIAM:	:	
KANE; GARY GRIESER; ROBERT SKOWRENSKI, II;	:	
RICHARD CALANNI; RICHARD DiBENEDETTO;	:	
JAMES R. BROWN; THOMAS BRODO; ROLAND	:	
PIERSON; STANLEY YACKER, ESQ.; MICHAEL	:	
ALFIERI, ESQ.; RICHARD PEPSNY, ESQ.; ANTHONY	:	CERTIFICATION OF
M. CICALESE, ESQ.; LAWRENCE CUZZI; ANTHONY	:	EDWARD J. HAYES IN
D'APOLITO; DAP CONSULTING, INC.;	:	OPPOSITION TO MOTION
COMMONWEALTH LAND TITLE INSURANCE CO.;	:	FOR PARTIAL SUMMARY
NATIONS TITLE INSURANCE OF NEW YORK, INC.;	:	JUDGMENT OF WALSH
FIDELITY NATIONAL TITLE INSURANCE CO. OF	:	SECURITIES, INC.
NEW YORK; COASTAL TITLE AGENCY; STEWART	:	
TITLE GUARANTY COMPANY; IRENE DiFEO;	:	
DONNA PEPSNY; WEICHERT REALTORS; and	:	
VECCHIO REALTY, INC., d/b/a MURPHY REALTY	:	
BETTER HOMES AND GARDENS,	:	
Defendants.	:	

I, EDWARD J. HAYES, hereby certify as follows:

1. I am an attorney-at-law licensed to practice in the Commonwealth of Pennsylvania and am a partner in the law firm of Fox Rothschild LLP, attorneys for Fidelity National Title Insurance Company of New York and Nations Title Insurance Company of New York (collectively, "Fidelity"). On February 5, 1998, the Court granted my admission pro hac vice in this matter. As such, I am fully familiar with the facts stated herein based upon personal knowledge and review of documents. I make this certification in opposition to the motion for partial summary judgment filed by Plaintiff, Walsh Securities, Inc. ("Walsh").

2. Attached as Exhibit "A" are copies of relevant portions of the deposition transcript of Robert C. Walsh, the president of Walsh.

3. Attached as Exhibit "B" is a copy of the jacket for the ALTA 1992 loan policy. I certify under the penalty of perjury that the foregoing statements made by me are true and correct.

Date: December 23, 2011

s/ Edward J. Hayes, Esquire